

# **EXHIBIT A**

ORIGINAL

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JAMES BONOMO,

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Plaintiff,

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-against-

Case No.  
07 CV 5967

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MITSUBISHI INTERNATIONAL  
CORPORATION,

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Defendant.

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November 9, 2007  
9:42 a.m.

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Videotaped Deposition of JAMES BONOMO,

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taken by the Defendant, pursuant to notice, at

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the offices of Paul Hastings Janofsky & Walker

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LLP, 75 East 55th Street, New York, New York,

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before Douglas Winter, a Shorthand Reporter

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and Notary Public.

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2 A p p e a r a n c e s :

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LIDDLE & ROBINSON, LLP  
Attorneys for Plaintiff  
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New York, New York 10022

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BY: JEFFREY L. LIDDLE, ESQ.  
CHRISTINE A. PALMIERI, ESQ.

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PAUL HASTINGS JANOFSKY & WALKER LLP  
Attorneys for Defendant  
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New York, New York 10022

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BY: STEPHEN SONNENBERG, ESQ.  
ALISON R. KIRSHNER, ESQ.  
(a.m. session)

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Also Present:

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JAMES CHRISTE, Videographer,  
Winter Reporting, Inc.

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DIANE KNOX, Mitsubishi Corporation

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1 (Bonomo - 11/9/07)

10:35:58 2 BY MR. SONNENBERG:

10:36:53 3 Q. Have you had a chance to review  
10:36:55 4 this document?

10:36:56 5 A. Yes.

10:36:56 6 Q. This is the handbook that you  
10:36:58 7 acknowledged receiving on October 18, 2001,  
10:37:01 8 correct?

10:37:02 9 A. Yes.

10:37:03 10 Q. You understood that this handbook  
10:37:05 11 applied to your employment at MIC, right?

10:37:08 12 A. Yes.

10:37:08 13 Q. Did you read the handbook after  
10:37:10 14 you received it?

10:37:11 15 A. Yes.

10:37:11 16 Q. I'd like you to turn, please, to  
10:37:13 17 Page 19, and I'd like to focus in particular on  
10:37:27 18 the section entitled "Employee Harassment,  
10:37:30 19 Intimidation."

10:37:31 20 You read this section after you  
10:37:33 21 received the handbook, correct?

10:37:35 22 A. Yes.

10:37:36 23 Q. You understood while you were  
10:37:37 24 employed at MIC, that company policy prohibited  
10:37:41 25 harassment of an employee, correct?

1 (Bonomo - 11/9/07)

10:37:44 2 A. Yes.

10:37:44 3 Q. You also understood while you  
10:37:46 4 worked at MIC, that company policy prohibited  
10:37:49 5 discrimination against an employee based on  
10:37:51 6 their ethnic origin or other reasons, correct?

10:37:54 7 A. Yes.

10:37:56 8 Q. You also understood that if you  
10:37:57 9 felt you were subjected to harassment or  
10:38:00 10 discrimination, you could contact your  
10:38:02 11 supervisor, manager or the Personnel Department  
10:38:05 12 to complain, correct?

10:38:06 13 A. Yes.

10:38:07 14 Q. You were aware in 2005 that MIC  
10:38:10 15 had a 24 hour compliance hotline through which  
10:38:15 16 you could report violations of company policy,  
10:38:18 17 correct?

10:38:18 18 A. Yes.

10:38:19 19 Q. You were aware in 2005 that MIC  
10:38:22 20 had a web site on the Internet to which you  
10:38:26 21 could report violations of company policy,  
10:38:28 22 correct?

10:38:30 23 A. Um, yes.

10:38:31 24 Q. You were aware in 2006 and 2007 of  
10:38:35 25 the hotline and the web site, correct -- I am

C E R T I F I C A T E

I, DOUGLAS WINTER, a Shorthand  
Reporter and Notary Public, do hereby  
certify:

I reported the proceedings in the  
within-entitled matter, and that the  
within transcript is a true record of  
such proceedings.

I further certify that I am not  
related, by blood or marriage, to any of  
the parties in this matter and that I am  
in no way interested in the outcome of  
this matter.

IN WITNESS WHEREOF, I have  
hereunto set my hand this 28 day  
of November, 2007.

  
\_\_\_\_\_  
DOUGLAS WINTER